

KELLEY DRYE & WARREN LLP

Lauri A. Mazzuchetti (*pro hac vice* forthcoming)

Glenn T. Graham (State Bar No. 338995)

Emily E. Clark (*pro hac vice* forthcoming)

One Jefferson Road

Parsippany, New Jersey 07054

Telephone: (973) 503-5900

Facsimile: (973) 503-5950

lmazzuchetti@kelleydrye.com

ggraham@kelleydrye.com

eclark@kelleydrye.com

Attorneys for Defendant Sunrun Inc.

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

PEGGY BANKS, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

SUNRUN INC.

Defendant.

Case No. 4:24-cv-07877-JST

**DEFENDANT SUNRUN INC.'S
NOTICE OF MOTION TO STRIKE
CLASS ALLEGATIONS**

Hon. Jon S. Tigar

Hearing Date: April 10, 2025

Time: 2:00 pm

Location: Zoom

CASE NO. 4:24-CV-07877-JST

DEFENDANT'S NOTICE OF MOTION TO STRIKE CLASS ALLEGATIONS

1 TO THE COURT, PLAINTIFF, AND HER COUNSEL:

2 PLEASE TAKE NOTICE that on April 10, 2025 at 2:00 pm, in the above-captioned Court,
3 located at 450 Golden Gate Avenue, San Francisco, California, Defendant Sunrun Inc. (“Sunrun”)
4 will and hereby does move the Court for an order dismissing and/or striking Plaintiff’s class
5 allegations (Count I) pursuant to Rules 12(f) and 23.

6 Sunrun moves to strike Plaintiff’s class allegations because it is apparent that Plaintiff’s
7 proposed class fails to meet Rule 23’s requirements of predominance and adequacy. Plaintiff’s class
8 allegations should be stricken for these reasons.

9 This Motion is based on this Notice and Motion, the previously filed memorandum (ECF
10 No. 17), the previously filed request for judicial notice (ECF No. 18), all pleadings, records, and
11 files in this action, and such evidence and argument as may be presented at or before the hearing on
12 this Motion.

13 DATED: January 28, 2025

KELLEY DRYE & WARREN LLP

14
15 By: /s/ Glenn T. Graham

Lauri A. Mazzuchetti (*pro hac vice* forthcoming)

Glenn T. Graham

16 Emily E. Clark (*pro hac vice* forthcoming)

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19 ggraham@kelleydrye.com

20 eclark@kelleydrye.com

21 *Attorneys for Defendant Sunrun Inc.*